



WV 00079 7720
Gen

STATE OF WEST VIRGINIA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
1260 Greenbrier Street
Charleston, West Virginia 25311

ARCH A. MOORE, JR.
Governor

RONALD R. POTESTA
Director

ROBERT K. PARSONS
Deputy Director

December 12, 1988

Ms. Nancy Ray
Wheeling-Pittsburgh Steel Corp.
Route 2
Beech Bottom, West Virginia 26030

Dear Ms. Ray:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Waste Management. This report is based on the inspection conducted on October 19, 1988.

Please refer to the "Compliance Evaluation" section of the report for those violations discovered during the course of this inspection.

A copy of this report will be referred to the Enforcement Unit of this Division with an additional copy transmitted to the United States Environmental Protection Agency (U. S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at 304/348-5929.

Sincerely,

Ava C. Zeitz
Compliance Monitoring and
Enforcement Section Leader

ACZ/pd
Enclosure

cc: Doug Donor, EPA, Region III
John Meeks, Enforcement Unit
David Swisher, Inspector

RCRA COMPLIANCE SECTION
RECEIVED

DEC 28 1988

INSPECTION FACT SHEET

COMPANY NAME: Wheeling-Pittsburgh Steel I.D. #: WVD000797720

MAILING ADDRESS: Rt. 2 TYPE OF FACILITY: Generator
Beech Bottom, WV 26030

LOCATION: Beech Bottom Plant COUNTY: Brooke

COMPANY CONTACT: Nancy Ray HANDLING CODES: S01
Environmental Coordinator

PHONE: (304) 234-2672

PURPOSE: Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E;
West Virginia Administrative Regulations for Chapter 20-5E;
and/or 40 CFR Part 265.

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)

D001 F003
D007 F005

DATE INSPECTED: October 19, 1987

INSPECTOR(S): (1) David B. Swisher, West Virginia Department of Natural Resources,
Division of Waste Management

(2)

(3)

DATE PREPARED: October 25, 1988

PREPARED BY: David B. Swisher, Division of Waste Management

INSPECTION REPORT

COMPANY: Wheeling-Pittsburgh Steel Corporation

DATE INSPECTED: October 19, 1988

INSPECTOR: David B. Swisher, West Virginia Department of Natural Resources,
Division of Waste Management

DATE PREPARED: October 25, 1988

PREPARED BY: David B. Swisher, Division of Waste Management

On October 19, 1988 the above referenced inspector conducted a Compliance Evaluation Inspection of Wheeling-Pittsburgh Steel, Beech Bottom Plant. Upon my arrival at 1015 hours I was met by Steve Beacroft, Plant Manager and Tom Waligura, Environmental Control.

Upon presentation of appropriate credentials, I advised the officials of my authority as a representative of the Chief of the Division of Waste Management pursuant to Chapter 20 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act and they acknowledged my authority. The facility representatives were informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgated thereunder.

There have been no changes in hazardous waste operations at this facility since the last CEI (October 20, 1987). Hazardous waste is generated as a result of cleaning and surface preparation of steel coils.

This inspection consisted mainly of a visual walk through of the facility. The regular facility representatives; Nancy Ray, Environmental Control and Jim Allen, Engineering Department, were not available on the day of this inspection, therefore, the facility's records were not available for inspection (facility representatives did not know the location of the records). Mr. Beacroft, Plant Manager, indicated that Mr. Allen would return to work on Monday, October 24, and that the records would be available for inspection at that time.

The inspection began with observation of the coil coating line. Located on the line is the paint filtering room. This room is a satellite accumulation area for the facility's waste paint/solvent and waste rags/paint filters. Ed Maciak, Paint Line Foreman, indicated that approximately 4 days are required to fill one drum of waste. At the time of this inspection, there was 1 drum being filled, and 3 full drums sitting outside the room. These drums had not been moved to the drum storage area. I advised Mr. Maciak that there is a 3-day time limit on moving drums from a satellite area to the storage area.

From the coating line, we proceeded to the drum storage area. Located inside the storage buildings were 88 drums of hazardous waste, 63 drums of waste oil, and 1 drum of asbestos waste. Also in the building were several empty drums designated for return.

CEI (Wheeling-Pittsburgh Steel)
October 25, 1988
Page two

The 88 drums of hazardous waste are comprised of waste paint (described as "obsolete" by factory reps.), waste rags, and paint filters. The paint filters are actually cloth "bags" which trap paint solids so that the filtered paint may be reused. The contents of the drums containing the paint filters are mostly liquid materials.

Inspection of the drum storage area revealed 38 drums stored for over 90 days, 11 drums that were not labelled, and 11 drums which had no date on the label. Some of the dates on the drums went back to February, '88.

Mr. Maciak explained that when a drum of hazardous waste is brought into the storage area, they paint the drum black and then place a hazardous waste label on it. It appears that this practice may be causing a delay in getting labels on the drums. This is apparent due to the fact that there were 16 drums of waste "obsolete" paint located in the storage area, 5 of which had been painted black and were labelled. The remaining 11 drums had not been painted and consequently, were not labelled or dated.

As earlier stated, one drum of hazardous waste is generated about every 4 days. Given the 3-day time period to move the drum into storage, one would expect the dates on the drums to be approximately a week apart. However, this is not the case. Inspection shows that there are several drums being labelled on the same date. Although the dates are somewhat erratic, it appears that labels are being placed on drums approximately every 2-2½ weeks. Based on these observations and the label/date discrepancies, Wheeling- Pittsburgh should examine their drum handling procedures and adjust them accordingly.

Inspection of the wastewater treatment plant showed no change since the last CEI.

The rolloff container used to accumulate WWTP sludge (D007) meets the definition of a container as defined by the West Virginia Hazardous Waste Management Regulations, and therefore, should be labelled with the words "Hazardous Waste".

Following the visual inspection of the plant, I departed the facility with the understanding between myself and the facility representatives that I would return the following week to conduct the file review.

On Monday, October 24, 1988 I attempted to contact Nancy Ray, Environmental Control, to set up an appointment to conduct the remainder of the CEI. I was informed that Ms. Ray was out of the office for the entire week. At that point, I contacted Mr. Steve Beacroft, Plant Manager, and informed him that I would be at the plant site on Tuesday, October 25, 1988 at 1000 hours to complete the inspection. Mr. Beacroft indicated that he would not be in the plant that day, nor would Mr. Allen or Mr. Maciak. I advised Mr. Beacroft that I could not delay the inspection any further, and that if he would not be there, he was to ensure that the appropriate records would be available for my review. Mr. Beacroft agreed.

CEI (Wheeling-Pittsburgh Steel)
October 25, 1988
Page three

On Tuesday, October 25, 1988 I received a call from Mr. Beacroft's secretary prior to the time of the inspection. She stated that Mr. Beacroft was off sick and that she could not locate any of the records for the inspection. Apparently, a portion of the manifests were given to the gate guard for my inspection. However, he did not have all of the manifests, nor did he have access to any of the other files. I was asked to postpone my inspection until someone was available who had "authority" to provide me with the necessary records. Repeated attempts to contact someone in Environmental Control were unsuccessful.

Based on this situation, and my repeated efforts to gain access to the facility records, I informed the facility personnel that I would not return at their convenience to inspect the files, and that I would simply note that the records were not available for inspection nor could they be located by facility representatives.

At that point, I considered the inspection concluded.

Compliance Evaluation

The following violations of the West Virginia Hazardous Waste Management Regulations (hereinafter "the Regulations") were noted during the inspection:

- 1) This facility has stored hazardous waste for more than 90 days without having a permit to do so and therefore, is in violation of Sections 6.3.5.b and 11.1 of the Regulations.
- 2) The date upon which each period of accumulation began was not marked on the hazardous waste containers. This is a violation of Section 6.3.5.a.2 of the Regulations.
- 3) While being accumulated on site, each container was not labelled "Hazardous Waste". This is a violation of Section 6.3.5.a.4 of the Regulations.
- 4) Containers of hazardous waste accumulated in the facility's satellite accumulation area were not moved into the drum storage area, labelled, and dated in accordance with Section 6.3.5.a within 3 days. This is a violation of Section 6.3.5.c.2 of the Regulations.
- 5) This facility did not make all records relating to the generation, transportation, storage, treatment or disposal of hazardous waste available for inspection and therefore, is in violation of Chapter 20, Article 5E-12(e) of the West Virginia Code.

CH (Wheeling-Pittsburgh Steel)
October 25, 1988
Page four

- 6) The facility's contingency plan does not contain phone numbers or addresses for the emergency coordinators. This is a violation of 40 CFR 265.52(d) as referenced by Section 6.3.5.a.5 of the Regulations.

Concerns

The following concerns were raised during the inspection:

- 1) Drum handling procedures may be causing a delay in dating and labelling hazardous waste containers.
- 2) Based on the analysis of paint/solvent waste provided by Wheeling-Pittsburgh Steel during the last CEI (see October 21, 1987 supplemental memo), the material contains solvent wastes (F003, F005) in the range of 5-40%. However, Wheeling-Pittsburgh Steel maintains that based on their knowledge of the material and the process, the waste is properly classified as D001 (see response to notice of non-compliance dated January 26, 1988).

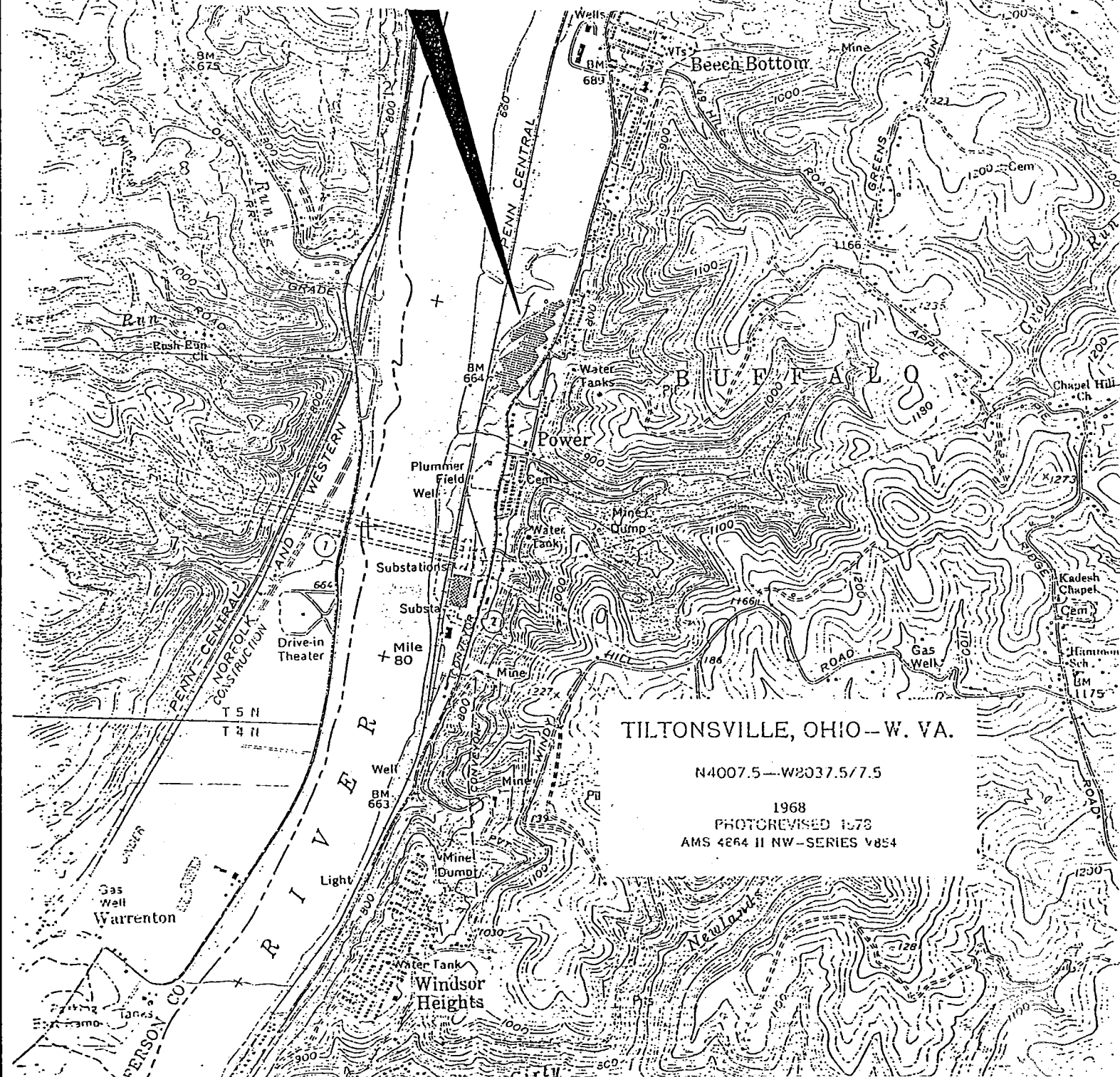
It is this inspector's contention that the waste should be classified as F003, F005. A more detailed analysis will be needed to show insignificant concentrations of F-solvents.

- 3) According to the West Virginia Code, Chapter 20, Article 5E, an authorized representative of the Chief of the Division of Waste management may enter a facility at reasonable times for the purpose conducting an inspection. It is the responsibility of someone located on the facility premises to make all required records and documents available for inspection.

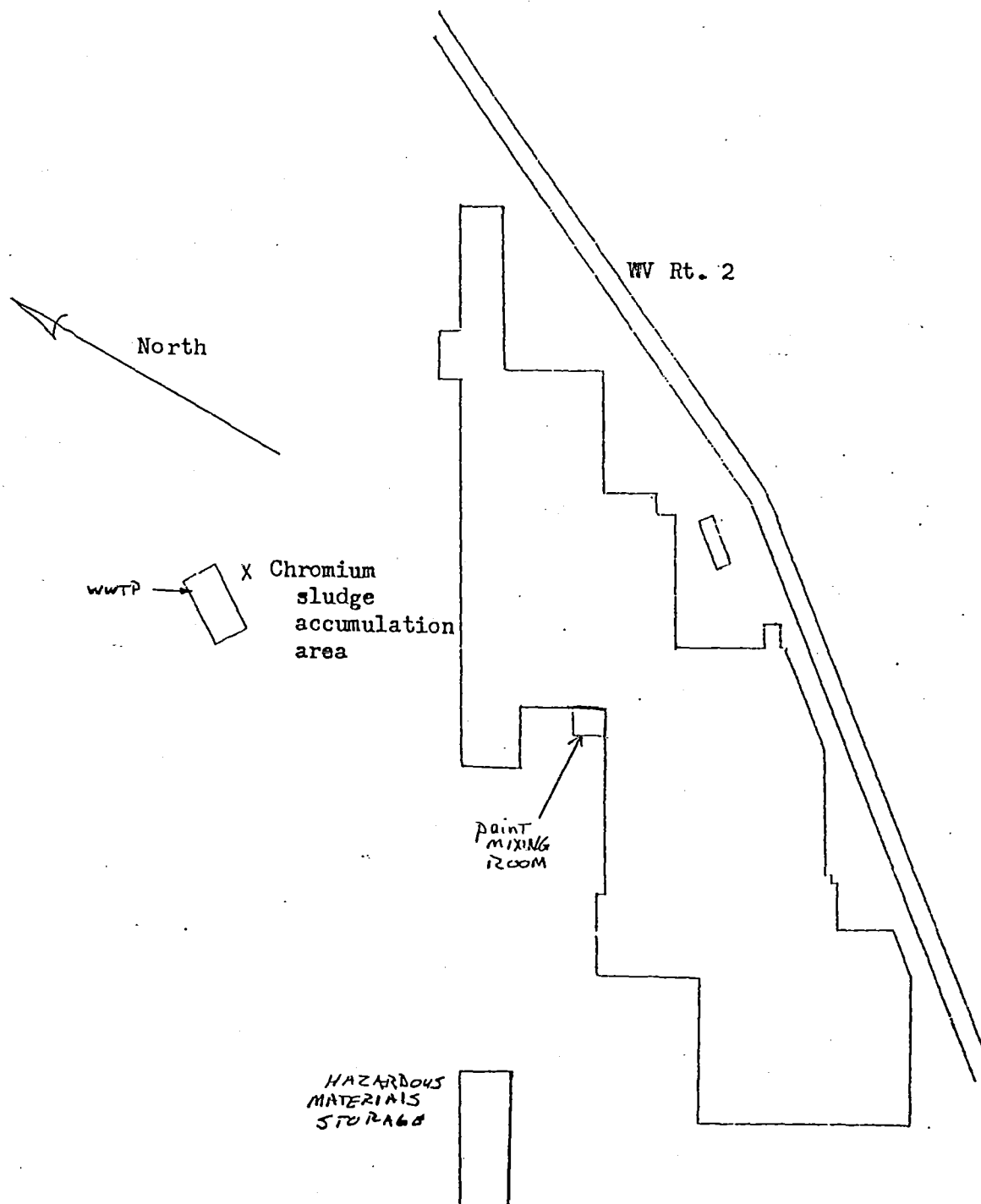
While it is Wheeling-Pittsburgh Steel's policy to have a corporate environmental representative present for inspections, the company cannot expect the Division to postpone an inspection pending availability of the representative.

- 4) At the time of the inspection, the designated emergency coordinator was not familiar with the location of the facility's contingency plan.

BEECH BOTTOM PLANT
WHEELING PITTSBURGH
WVD000797720



ATTACHMENT "B"
SITE MAP
BEECH BOTTOM PLANT
WHEELING PITTSBURGH
WVD000797720



* MAP NOT TO SCALE